

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In The Matter Of )  
 )  
Amendment Of The Commission's ) RM-8499  
Rules To Establish A New Radio )  
Service. )

To: The Commission

REPLY COMMENTS

Tandy Corporation (Tandy),<sup>1/</sup> pursuant to Section 1.405(b) of the Commission's rules, hereby submits its Reply to those commenting on its above-captioned Petition for Rule Making to establish a new radio service -- the Family Radio Service (FRS).<sup>2/</sup>

Tandy explained in its Petition that it foresees a new unlicensed two-way voice radio service that will serve the day-to-day as well as emergency communications needs of families, friends and public service organizations. FRS will fill a market void by providing Americans with convenient, high quality, short-range communication capabilities not met by any existing or proposed radio service, with only a modest initial investment. Unlike PCS

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<sup>1/</sup> Tandy is America's leading retailer of consumer electronics, with nearly 7,000 Radio Shack, Computer City, Incredible Universe, and other affiliated stores nationwide, and more than 34,000 employees in the United States. Members of one-third of American households, more than 55 million consumers, frequent a Tandy store each year.

<sup>2/</sup> Petition for Rule Making filed July 20, 1994 (FCC Public Notice Report No. 2023 July 26, 1994).

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and cellular, FRS will not be interconnected with the telephone network.

Perhaps one of the most important underpinnings of FRS's broad appeal will be the absence of any activation, monthly service, or per-minute charges. In this regard, the Private Radio Section of the Telecommunications Industry Association (TIA) notes that for FRS "to reach a large segment of the consumer market, it must offer cost-effective equipment without recurring charges or fees."<sup>3/</sup> Tandy also agrees with TIA's observation "that there is a potentially strong market for low-cost, two-way radios that provide improved communications quality and functionality over that currently offered by the Citizens Band Radio Service ("CB")."<sup>4/</sup>

In addition to the many uses Tandy mentioned for FRS in its Petition,<sup>5/</sup> Motorola has identified additional needs FRS could fulfill which are not adequately met by existing radio services. For example, Motorola notes that FRS would enable "hikers, bikers and snowmobilers . . . to quickly contact lost companions and guide them onto proper course. . . . During camping trips, parents would be able to allow their children to wander without fear of losing contact."<sup>6/</sup>

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<sup>3/</sup> TIA Comments at 2.

<sup>4/</sup> TIA Comments at 1.

<sup>5/</sup> See Tandy Petition at 3-4.

<sup>6/</sup> Motorola Comments at 4-5.

Several commenters have expressed concern about technical matters, but no commenter has challenged the broad public appeal of FRS that Tandy described in its Petition. Indeed, REACT International, Inc. (REACT)<sup>7/</sup> suggests that FRS could attract millions of new radio users,<sup>8/</sup> while Dr. Michael C. Trahos notes FRS would result in a "flood" of new radio users.<sup>9/</sup> Although it takes issue with certain aspects of Tandy's proposal, REACT "strongly agrees with the [FRS] concept"<sup>10/</sup> and argues that "[m]any of the concepts advanced by Tandy contain merit, and should be implemented in a new, consumer grade radio service such as its proposed FRS."<sup>11/</sup>

The Personal Radio Steering Group (PRSG), which expends much effort addressing issues unrelated to the FRS proposal, suggests that the proposed 12.5 KHz channel separation with a 5 KHz deviation for FRS might create interference.<sup>12/</sup> PRSG fails to explain how low power FRS operating on the assigned and unassigned GMRS 462/467 MHz interstitial channels would cause interference

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<sup>7/</sup> REACT (Radio Emergency Associated Communication Teams) is a worldwide, member based organization of public service Teams serving their local communities." REACT Comments at 2.

<sup>8/</sup> See REACT Comments at 4.

<sup>9/</sup> See Trahos Comments at 6. While Dr. Trahos opposes FRS as outlined by Tandy, he does offer some useful observations which would be appropriate for consideration in an FRS rule making proceeding.

<sup>10/</sup> REACT Comments at 9.

<sup>11/</sup> Id. at 8.

<sup>12/</sup> PRSG Comments at 11.

when there is little cognizable interference caused by the current higher powered operations conducted on the assigned interstitial channels.<sup>13/</sup>

In its Petition for Rule Making, Tandy suggests that "If the Commission finds it would serve the public interest, FRS users also will be able to access the GMRS emergency channel pair."<sup>14/</sup> That suggestion, which is apparently the source of some discomfort to PRSG and Dr. Trahos, is merely one facet of Tandy's proposal that should be addressed -- along with the technical issues noted above -- in the FRS rule making proceeding. TIA, like Tandy, "is confident that technical standards can be crafted to adequately protect GMRS receivers," and "will provide further comments on the appropriate technical rules for devices operating in the specific proposed environment."<sup>15/</sup>

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<sup>13/</sup> Motorola "support[s] investigating whether limiting the authorized bandwidths of offset channel operations would afford any additional needed protection." Motorola Comments at 6.

<sup>14/</sup> Tandy Petition at 9.

<sup>15/</sup> TIA Comments at 2.

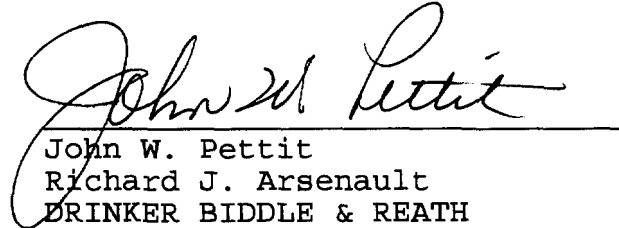
WHEREFORE, in view of the foregoing, Tandy Corporation respectfully requests that the Commission expeditiously issue a *Notice of Proposed Rule Making* proposing the creation of a new, unlicensed Family Radio Service.

September 9, 1994

Respectfully submitted,

RADIO SHACK DIVISION OF  
TANDY CORPORATION

Jessie M. Slayton  
Manager, Regulatory Affairs  
Radio Shack Division  
Tandy Corporation  
1400 One Tandy Center  
Fort Worth, Texas 76102  
(817) 390-3203



John W. Pettit  
Richard J. Arsenault  
DRINKER BIDDLE & REATH  
901 Fifteenth Street, N.W.  
Suite 900  
Washington, D.C. 20005  
(202) 842-8800

Its Attorneys

**CERTIFICATE OF SERVICE**

I, Beverly J. Marshall, hereby certify that on 9th day of September 1994 I caused a copy of the attached Reply Comments of Tandy Corporation to be served by hand delivery to the following:

Chairman Reed E. Hundt  
Federal Communications Commission  
Room 814  
1919 M Street, N.W.  
Washington, D.C. 20554

Commissioner H. Quello  
Federal Communications Commission  
Room 802  
1919 M Street, N.W.  
Washington, D.C. 20554

Commissioner Andrew C. Barrett  
Federal Communications Commission  
Room 826  
1919 M Street, N.W.  
Washington, D.C. 20554

Commissioner Susan P. Ness  
Federal Communications Commission  
Room 832  
1919 M Street, N.W.  
Washington, D.C. 20554

Commissioner Rachelle B. Chong  
Federal Communications Commission  
Room 844  
1919 M Street, N.W.  
Washington, D.C. 20554

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Washington, D.C. 20554

And by first class U.S. mail postage prepaid on the following:

Eric Schimmel  
Vice President  
Telecommunications Industry  
Association  
2001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

Wayne Leland  
Chairman, Private Radio Section  
Mobile and Personal  
Communications Division  
Telecommunications Industry  
Association  
2001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

Corwin D. Moore, Jr.  
Administrative Coordinator  
Personal Radio Steering Group, Inc.  
P.O. Box 2851  
Ann Arbor, Michigan 48106

Dr. Michael C. Trahos  
4600 King Street, Suite 6K  
Alexandria, Virginia 22302

James E. Bear, Chairman  
Board of Directors  
REACT International, Inc.  
242 Cleveland Street  
P.O. Box 998  
Wichita, KS 67201

Michael D. Kennedy  
Vice President and Director,  
Regulatory Relations  
Motorola, Inc.  
1350 I Street, N.W.  
Washington, D.C. 20005

Janet C. Ernest  
National Regulatory  
Relations Administrator  
Motorola, Inc.  
1350 I Street, N.W.  
Washington, D.C. 20005

  
Beverly J. Marshall